



OFFICE OF
CHIEF COUNSEL

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

MEMORANDUM FOR: Hal Hicks
Associate Chief Counsel (International)

FROM: Matthew W. Frank, APA Program Director

DATE: June 6, 2005

SUBJECT: APA Quarterly Report for FY 2005,
Second Quarter Ending 3/31/05

The following are the APA Program's results for the second quarter of FY 2005 ("Q2").

APAs Completed

The APA Program completed 9 APA matters in Q2, consisting of 5 bilateral APAs and 4 unilateral APAs.

Negotiating-Position Papers

The APA Program completed 4 bilateral negotiating position papers in Q2.

Annual Reports

The APA Program completed its review of and closed 86 annual reports in Q2.

New Matters

The APA Program received 10 new APA matters in Q2, including 6 bilateral and 4 unilateral APAs. There were 4 withdrawals during Q2.

APA Inventory

The APA Program has an ending inventory of 223 open matters.¹ This consists of 163 bilateral and 60 unilateral matters.²

Attached for your information is the APA issuance report and open inventory reports as of March 31, 2005. Please contact me at (202) 435-5222 if any additional information is required.

Respectfully submitted,


Matthew W. Frank
APA Program Director

Attachments

cc: LMSB Commissioner
Director, International
National Director of Appeals
LMSB Division Counsel

1. This equals beginning Q2 inventory of 226 matters, plus 10 receipts, less 9 closures and 4 withdrawals $\{226 + 10 - 9 - 4 = 223\}$.

2. The 223 open matters include 11 pending dollar filings (4 bilateral and 7 unilateral). Thus

- The APA Program has an inventory of 212 active cases, i.e., 223 open matters less 11 pending dollar filings.
- The 212 active cases consist of 160 bilateral cases (164 total bilateral matters less 4 pending bilateral dollar filings) and 52 unilateral cases (59 total unilateral matters less 7 pending unilateral dollar filings).

The APA Program has forwarded 69 of the 160 active bilateral matters to Competent Authority. Thus, the APA Program has a current working inventory of 143 cases, consisting of 91 bilateral (160 active bilateral cases less 69 forwarded to Competent Authority) and 52 active unilateral cases.